

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROBERT SPRINGER, et al., individually  
and on behalf of all others similarly  
situated,

Plaintiffs,

v.

CODE REBEL CORPORATION, et al.,

Defendants.

Case No. 16-cv-3492 (AJN)

**NOTICE OF LEAD PLAINTIFFS' MOTION (1) FOR PRELIMINARY APPROVAL OF  
PROPOSED SETTLEMENT, (2) FOR APPROVAL OF THE FORM AND MANNER OF  
NOTICE, AND (3) TO SCHEDULE A HEARING ON FINAL APPROVAL OF THE  
SETTLEMENT AND ON PLAINTIFFS' COUNSEL'S APPLICATION FOR AN  
AWARD OF ATTORNEYS' FEES AND EXPENSES**

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Phillip Kim and the exhibits attached thereto; the accompanying Memorandum of Law; and all other papers and proceedings herein, the undersigned will move this Court, at the courthouse at 40 Foley Square, New York, NY, on a date and time designated by the Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for an order (i) preliminarily approving the proposed settlement of this action, (ii) approving the form and manner of notice, and (iii) scheduling a hearing on final approval of the Settlement and on Plaintiffs' Counsel's application for an award of attorneys' fees and expenses; and for such other and further relief as the Court deems proper and just. A copy of the Parties' agreed-upon Proposed Order Preliminarily Approving Settlement, Directing Notice to Class Members, and Setting Hearing for Final Approval of Settlement is attached as Exhibit A to the Settlement Agreement and Release dated May 12, 2017 filed contemporaneously herewith.

Dated: June 26, 2017

/s/ Phillip Kim

Phillip Kim

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 26, 2017, I caused a true and correct copy of the foregoing document to be served via email upon the parties and counsel listed below:

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/s/ Phillip Kim